

COVER SHEET



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ARIZONA CORPORATION COMMISSION DOCKET CONTROL CENTER

SE/COMPANY NAME:

RECEIVED

AZ CORP COMMISSION

DOCKET NO.

T-00000B-97-0238

IN THE MATTER OF US WEST COMMUNICATIONS
INC.'S COMPLIANCE WITH SECTION 271
O F THE TELECOMMUNICATIONS ACT OF 1996

FEB 24 3 29 PM '99

/A: _____

DOCUMENT CONTROL

NATURE OF ACTION OR DESCRIPTION OF DOCUMENT Please mark the item that describes the nature of the case/filing:

01 NEW APPLICATIONS

- | | |
|---|--|
| <input type="checkbox"/> NEW CC&N | <input type="checkbox"/> MAIN EXTENSION |
| <input type="checkbox"/> RATES | <input type="checkbox"/> CONTRACT/AGREEMENTS |
| <input type="checkbox"/> INTERIM RATES | <input type="checkbox"/> COMPLAINT (Formal) |
| <input type="checkbox"/> CANCELAN OF CC&N | <input type="checkbox"/> RULE VARIANCE/WAIVER REQUEST |
| <input type="checkbox"/> DELETION OF CC&N TERRITORY | <input type="checkbox"/> SITING COMMITTEE CASE |
| <input type="checkbox"/> EXTENTION OF CC&N (TERRITORY) | <input type="checkbox"/> SMALL WATER COMPANY -SURCHARGE (Senate Bill 1252) |
| <input type="checkbox"/> TARIFF - NEW (NEXT OPEN MEETING) | <input type="checkbox"/> NOTICE OF OPPORTUNITY |
| <input type="checkbox"/> REQUEST FOR ARBITRATION | <input type="checkbox"/> SALE OF ASSETS & TRANSFER OF OWNERSHIP |
| <input type="checkbox"/> (Telecommunication Act) | <input type="checkbox"/> SALE OF ASSETS & CANCELLATION OF CC&N |
| <input type="checkbox"/> FULLY OR PARTIALLY | <input type="checkbox"/> FUEL ADJUSTER/PGA |
| <input type="checkbox"/> ARBITRATED INTERCONNECTION | <input type="checkbox"/> MERGER |
| <input type="checkbox"/> AGREEMENT (Telecom. Act) | <input type="checkbox"/> FINANCING |
| <input type="checkbox"/> VOLUNTARY INTERCONNECTION | <input type="checkbox"/> MISCELLANEOUS |
| <input type="checkbox"/> AGREEMENT (Telecom. Act) | Specify _____ |

02 REVISIONS/AMENDMENTS TO PENDING OR APPROVED MATTERS

☐ APPLICATION
COMPANY _____
DOCKET NO. _____

☐ TARIFF
☐ PROMOTIONAL
DECISION NO. _____
DOCKET NO. _____
☐ COMPLIANCE
DECISION NO. _____
DOCKET NO. _____

MISCELLANEOUS FILINGS

- | | | | |
|----|------------------------------|------|--|
| 04 | AFFIDAVIT | 29 | STIPULATION |
| 12 | EXCEPTION | 38 | NOTICE OF INTENT |
| 18 | REQUEST FOR INTERVENTION | | (Only notification of future action/no action necessary) |
| 48 | REQUEST FOR HEARING | 43 | PETITION |
| 24 | OPPOSITION | 46 | NOTICE OF LIMITED APPEARANCE |
| 50 | COMPLIANCE ITEM FOR APPROVAL | X 39 | OTHER |
- Specify MCI WorldCom's Objections to
US West's First Set of Data Requests
and Motion to Stay Discvoery

Thomas H. Campbell, LEWIS AND ROCA,

Print Name of Applicant/Company/contact person
Attorneys for MCI WorldCom

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DOCUMENT CONTROL
BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN,
CHAIRMAN

CARL KUNASEK,
COMMISSIONER

TONY WEST,
COMMISSIONER

IN THE MATTER OF US WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH SECTION 271
OF THE TELECOMMUNICATIONS
ACT OF 1996

Docket #T-00000B-97-0238

**MCI WORLDCOM'S
OBJECTIONS TO US WEST'S
FIRST SET OF DATA
REQUESTS AND MOTION TO
STAY DISCOVERY**

MCI WorldCom, Inc. ("MCIW") objects to the First Set of Data Requests served upon MCIW by US West Communications, Inc. ("US West") on or about February 19, 1999.¹ US West has directed MCIW to respond to the data requests within 10 days from February 19, 1999.

AND AS GROUNDS FOR THIS OBJECTION, MCIW states:

1. On February 8, 1999, US West filed its 271 Notice of Intent with the Arizona Corporation Commission (the "Commission").
2. On February 16, 1999, a group of competitive local exchange carriers ("CLECs") including MCIW filed a joint motion to reject US West's 271 Notice of Intent. That motion speaks for itself, but generally asserts that US West has failed to comply with

¹ MCIW received the discovery requests after normal business hours on February 19, 1999.

1 the Commission's procedural requirements stated in Decision No. 60218 issued May 17,
2 1997, as amended, and that the Commission should not allow US West to unilaterally
3 modify the Commission's procedural requirements.

4 3. MCIW objects to responding to these First Data Requests as directed by US
5 West until the Commission has ruled upon the joint motion to reject US West's 271 filing.

6 4. Further, MCIW requests that US West's First Data Requests to MCIW be
7 stayed and that MCIW not be required to respond to the data requests until the
8 Commission has acted upon the joint motion to reject.

9 5. MCIW further reserves the right to make any other objections to the First
10 Data Requests that MCIW might otherwise make or apply for a protective order until after
11 the Commission has acted upon this objection and motion to stay discovery and the joint
12 motion to reject.

13 WHEREFORE, MCIW respectfully requests that the Commission grant this
14 objection and motion and stay these First Data Requests to MCIW.

15 DATED this 24th day of February, 1999.

16 LEWIS AND ROCA

17 
18

19 Thomas H. Campbell
20 40 N. Central Avenue
Phoenix, Arizona 85004

21 - AND -

22 Thomas F. Dixon
23 707 17th Street, Suite 3900
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24 Attorneys for MCI WorldCom, Inc.
25 Inc.
26

1 ORIGINAL and TEN
2 copies of the foregoing
3 filed this 24th day of February,
4 1999, at:

5 Arizona Corporation Commission
6 Utilities Division – Docket Control
7 1200 W. Washington Street
8 Phoenix, Arizona 85007

9 COPY of the foregoing hand-
10 delivered this 24th day of February, 1999,
11 to:

12 Paul Bullis, Chief Counsel
13 Legal Division
14 Arizona Corporation Commission
15 1200 W. Washington Street
16 Phoenix, Arizona 85007

17 Acting Director, Ray Williamson
18 Utilities Division
19 Arizona Corporation Commission
20 1200 W. Washington Street
21 Phoenix, Arizona 85007

22 COPY of the foregoing mailed
23 this 24th day of February, 1999, to:

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